



**California Regional Water Quality Control Board
Los Angeles Region**

SDMS DOCID#1140598



Linda S. Adams
Acting Secretary for
Environmental Protection

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Edmund G. Brown Jr.
Governor

January 14, 2011

Mr. James Stull
Continental Heat Treating
10643 Norwalk Boulevard
Santa Fe Springs, CA 90670

SUBJECT: APPROVAL OF MODIFIED WORK PLAN TO CONDUCT ADDITIONAL SOIL AND SOIL VAPOR INVESTIGATION PURSUANT TO CALIFORNIA WATER CODE SECTION 13267 ORDER

SITE/CASE: CONTINENTAL HEAT TREATING, 10643 SOUTH NORWALK BOULEVARD, SANTA FE SPRINGS (SCP NO. 1057, SITE ID NO. 204GW00)

Dear Mr. Stull:

Regional Water Quality Control Board, Los Angeles Region (Regional Board) staff have reviewed the December 30, 2010, *Modified Soils Investigation Work Plan* (Modified Work Plan), prepared by Fero Environmental Engineering, Inc. (Fero) for the above-referenced site. The Modified Work Plan is in response to the Regional Board's California Water Code (CWC) section 13267 Order (Order), dated May 5, 2010 and amended on October 5, 2010, requiring additional soil, soil-gas and groundwater investigations and the submittal of technical reports to delineate the lateral and vertical extent of contamination at and originating from the site.

On November 18, 2010, Regional Board staff held a meeting with Mr. James Stull, the owner and operator of the site; Mr. Michael Francis of Demetriou, Del Guercio, Springer & Francis, LLP; and, Mr. Bob Schneider of Trilogy Regulatory Services. During this meeting Mr. Francis and Mr. Schneider proposed a phased approach to assess impacted soil and soil vapor at the site. Subsequently, Fero submitted the Modified Work Plan for further investigation of impacted soil and soil vapor.

The Modified Work Plan proposes a site-wide soil-gas survey at 17 locations to depths ranging from 15 to 90 feet below ground surface (bgs) and to analyze samples for volatile organic compounds (VOCs). Soil matrix samples collected at 5 feet bgs at four of these boring locations will also be analyzed for total petroleum hydrocarbons (TPH). One of the borings will be advanced to approximately 120 feet bgs and converted into a groundwater monitoring/vapor extraction well. Three additional shallow soil borings to a depth of approximately 3 feet bgs will be sampled for screening analysis of California Assessment Manual (CAM) metals, including hexavalent chromium.

Following our review of the Modified Work Plan, we hereby approve the proposed work with the following comments and requirements:

1. According to the Revised Work Plan, the proposed well will be constructed of a single casing and screened from approximately 10 to 120 feet bgs. Groundwater at the Site was encountered

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at approximately 98 feet bgs during the installation of three groundwater monitoring wells in August 2010. Because the proposed well will be used for vapor extraction and groundwater monitoring, Regional Board staff recommend installation of multi-depth nested or cluster vapor extraction wells and a single groundwater monitoring well based on the following considerations:

- a. Previous investigations at the Site have documented VOCs impact from approximately the surface to groundwater. These VOCs are present in the various types of soils encountered at the site, including, silty clays, silts, sandy silts, silty sands, and sands. The effectiveness and efficiency of a vapor extraction system (VES) will vary in accordance with the different physical properties of these soils. Therefore, multi-depth vapor extraction wells will permit targeting the different soil zones and maximizing the efficiency of vapor extraction to remove residual VOCs contamination.
 - b. Multi-depth vapor extraction wells allow representative monitoring of different impacted zones, thus providing more detail on the effectiveness of the VES than the proposed single-screened vapor extraction/groundwater monitoring well. The VES operator can use these data to determine where higher concentrations of residual contamination remain in the soil column and adjust the VES accordingly.
 - c. Using the proposed well for both vapor extraction and groundwater monitoring may significantly impact groundwater elevation when vacuum is applied to the well head.
2. The Modified Work Plan proposes collection of soil matrix samples in lead sleeves (deep borings only), which will be sealed with Teflon sheeting and plastic caps, then submitted for laboratory analysis of VOCs and TPH. Use of lead sleeves to collect soil matrix samples for analysis of VOCs is not appropriate. Therefore, you are required to comply with US EPA Method 5035 or 5035A for collection of soil matrix samples for analysis of VOCs.
 3. Following the completion of field work and laboratory analysis as approved and required in this letter, an assessment report (Assessment Report) presenting the results of the proposed and required investigation shall be submitted to the Regional Board by **May 13, 2011**.
 4. If soil matrix and/or soil vapor contamination is not defined based on the results of the proposed sampling plan, you are required to submit a work plan for additional subsurface investigation to delineate the lateral and vertical limits of impacted soil matrix and soil vapor. This work plan, if necessary, shall be submitted to the Regional Board with the Assessment Report.
 5. The Regional Board's letter dated October 5, 2010, requested submittal of a site-specific health and safety plan (HASP) with the Modified Work Plan for the proposed field investigation. To date, the Regional Board has not received the HASP. Therefore, you shall submit a copy of the HASP to the Regional Board at least 5 days prior to conducting the proposed fieldwork.

Mr. James Stull
Continental Heat Treating
SCP No. 1057

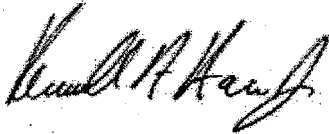
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The requirements to implement the Modified Work Plan and to submit the above technical reports are amendments to the existing CWC section 13267 Order issued by this Regional Board on May 5, 2010 and subsequently amended in the Regional Board's letter dated October 5, 2010. Pursuant to section 13268 of the CWC, failure to submit the required technical reports by the specified due dates, or in accordance with the schedule specified for submitting the HASP in comment 5 (above), may result in civil liability administratively imposed by the Regional Board in an amount up to one thousand dollars (\$1,000) per day for every day that each report is not received. These civil liabilities may be assessed by the Regional Board for failure to comply, beginning with the date that the violations first occurred, and without further warning.

If you have any questions, please contact the project manager Mr. David Young at (213) 576-6733 (dyoung@waterboards.ca.gov).

Sincerely,



AEO for
Samuel Unger, PE
Executive Officer

cc: Mr. Michael A. Francis, Demetriou, Del Guercio, Springer & Francis, LLP
Mr. Bob Schneider, Trilogy Regulatory Services
Mr. Rick Fero, Fero Environmental Engineering, Incorporated